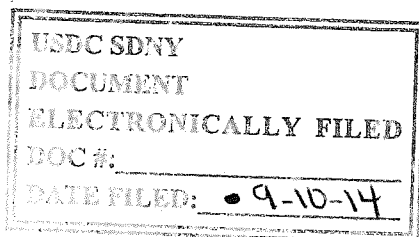
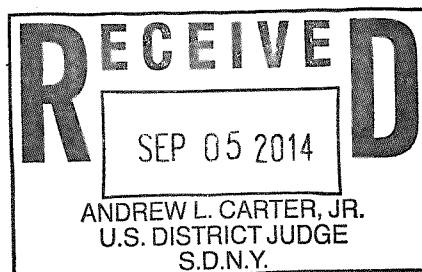


MEMO ENDORSED

Federal Defenders
OF NEW YORK, INC.Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392David E. Patton
Executive DirectorSouthern District of New York
Jennifer L. Brown
Attorney-in-Charge

September 5, 2014

VIA E-MAILThe Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007Re: United States v. Paul Ceglia
12 Cr. 876 (ALC)

Dear Judge Carter:

I write to respectfully request that the Court modify Mr. Ceglia's bond conditions to release certain properties which currently secure the \$250,000 bond. If the modification request is granted, Mr. Ceglia will be able to afford to retain his counsel of choice, private attorney Robert R. Fogg. In addition, the defense and the government ask that the Court schedule a status conference at its earliest convenience to discuss the trial schedule.

When Judge McMahon set the conditions of Mr. Ceglia's bond, she ordered that the \$250,000 personal recognizance bond be secured by all real property owned by Mr. Ceglia and his parents. At the time of that bail hearing, the valuations of those properties and the equity in them was unknown. As it turned out, the 27 properties owned by Mr. Ceglia and his parents (modestly valued rental properties in Wellsville, New York), had a total equity value of approximately \$650,000.

With the consent of the government, I respectfully request that the Court modify the bond so that it is secured by property worth \$250,000. This modification would allow the confessions of judgment related to any remaining property to be lifted. Based on current county tax assessments, there are six properties (which have been identified for the Government) which would be sufficient to satisfy the bond, allowing the remaining 21 properties to be released.

This modification would continue to reasonably assure Mr. Ceglia's appearance in court, but it would allow Mr. Ceglia to obtain the funds necessary to retain Robert Fogg. I have spoken with Mr. Fogg, and if the bond modification is granted, Mr. Fogg will immediately seek the

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York

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Court's approval to enter the case as Mr. Ceglia's sole counsel. If that request is granted, the Federal Defenders would then seek to be relieved.

In light of the fact that the value of the 27 properties far exceeds the amount of the bond, the government consents to the bond modification as long as it is satisfied that the remaining properties securing the bond contain equity of at least \$250,000. However, to the extent Mr. Ceglia's counsel may seek an adjournment of the trial, which is currently scheduled for November 17, 2014, the government would like to be heard on that issue at the Court's earliest convenient date. The government is aware that if the Federal Defenders were to remain as counsel, we would seek a brief adjournment of the trial.

Accordingly, I respectfully request that the Court grant the bond modification and schedule a conference to address Mr. Ceglia's representation and the trial date. Thank you for your consideration of this matter.

Respectfully submitted,



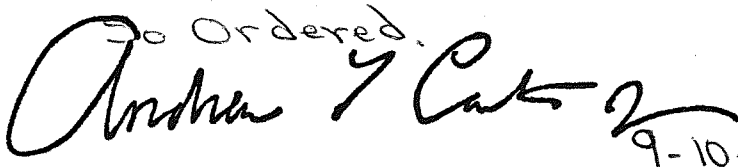
David E. Patton
Attorney for Paul Ceglia
(212) 417-8738

cc: AUSA Janis Echenberg
AUSA Christopher Frey

SO ORDERED:

Hon. Andrew L. Carter, Jr.
United States District Court

A status conference is set for 9/15/14 at 3:30 p.m. The issues raised in defense counsel's 9/5/14 letter will be addressed by the Court at that time.

So Ordered.

9-10-14